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tubing to cause positive engagement of said tubing by said reel; and

routing said tubing off of said reel onto said tubing storage spool, said tubing storage spool mounted on a cradle vertically and horizontally adjustable to accept varying spool widths and diameters.

## REMARKS/ARGUMENTS

This amendment is submitted per the request of the Examiner to place the amendment in the proper manner pursuant to the MPEP.

This Supplemental Amendment response as well as the previous response are served on the third party requester for reexamination as evidenced by a certificate of service provided herewith in the manner provided in 37 CFR 1.248.

A Substitute Reissue Declaration by the Inventor is submitted with this amendment which per the request of the Examiner to set forth in more detail at least one error in sufficient specificity, which is relied upon to support the reissue application.

For these reasons it is submitted that this application is condition for allowance. If there are any question, call the undersigned at the telephone number indicated below.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached page is captioned "Version with markings to show changes made."

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2375, under Order No. HO-P02233US0 from which the undersigned is authorized to draw.

Dated: December 23, 2002

Respectfully submitted,

Edward D. Steakley

Registration No.: 47,964

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Attorneys for Applicant

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## Version With Markings to Show Changes Made

- 7. The apparatus of claim [1]  $\underline{6}$  wherein said opposed pivotable bullnose arms are horizontally slidably attached to said cradle frame to accept a range of storage spool widths.
- 8. The apparatus of claim [1]  $\underline{6}$  wherein said opposed pivotable bullnose arms are vertically slidably attached to said cradle frame to accept a range of storage spool diameters.
- 11. A method of retrieving a length of coiled tubing <u>from beneath a surface</u> and storing said tubing on a tubing storage spool comprising:

rotating a reel <u>for receiving said coiled tubing at an angle less than 90° to said surface;</u>

exerting pressure against more than 90° of the circumference of said reel while running said tubing around a portion of said circumference to exert pressure against said tubing to cause positive engagement of said tubing by said reel; and

routing said tubing off of said reel onto said tubing storage spool, said tubing storage spool mounted on a cradle vertically and horizontally adjustable to accept varying spool widths and diameters.

## **CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the Response to Office Action, in a manner provided in 37 CFR 1.248, is being deposited with the United States Postal Service on December 23, 2002, addressed to:

Cynthia G. Seal 2925 Briarpark, Suite 930 Houston, Texas 77042

Edward D. Steakley

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